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October 28, 2024

Application GRANTED.

Honorable Jennifer H. Rearden
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

SO ORDERED.

Jennifer H. Rearden, U.S.D.J.

Dated: October 29, 2024

RE: ***Marcia McDonald v. Pharney Group, LLC, 23-CV-6025 (JHR)***

Your Honor:

I am an attorney for the Defendant in the above-referenced case. I write to request an extension of the deadlines in the previously proposed schedule for Defendant's contemplated motion for summary judgment in this case. The undersigned has conferred with Plaintiff's counsel, who has consented to the updated schedule proposed below. The reason for this request is that the undersigned was unexpectedly assigned a trial date of October 29, 2024 in the case of Optiquet Resources v. Cayuga Ridge in New York County Supreme Court, Index No. 153048/2018. While the undersigned is optimistic that this case will settle before trial commences, it was necessary to conduct trial preparation regardless. This, in conjunction with other motion practice and the Jewish holidays, made it necessary for the undersigned to request the below amended schedule. Because Plaintiff's counsel will be on an extended vacation during the holiday season, the proposed dates for Plaintiff's opposition have been extended correspondingly. The amended proposed schedule is as follows:

Defendant's Motion for Summary Judgment: November 15, 2024

Plaintiff's Opposition to Motion: January 24, 2025

Plaintiff's Reply in Further Support: February 7, 2025

Sincerely,

/s/ Joseph Gutmann

Joseph Gutmann

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